

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

FILED

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U.S. BANKRUPTCY COURT
RICHMOND DIVISION

In re: } Chapter 13
MICHAEL ROBERT DICKINSON } Case No. 18-34024-KRH
DEBTOR }
Hearing Date: November 7, 2018
12:00 p.m.

CREDITOR'S MOTION FOR AN ORDER PURSUANT TO BANKRUPTCY
RULE 2004 DIRECTING THE EXAMINATION OF DEBTOR AND
WITNESSES AND PRODUCTION OF DOCUMENTS FROM KNOWLEDGEABLE
PARTIES.

Samuel J.T. Moore, III A creditor in the above referenced case,
and acting PRO-SE, hereby files this motion PURSUANT TO
RULE 2004 of the Federal Rules of Bankruptcy Procedure seeking
entry of an order directing questioning and examination under oath
of the debtor and the production of all pertinent documents.

The urgency and necessity of this motion is based upon the
inconsistencies and untruthfulness of the debtor's testimony
when questioned by the creditor during the Creditor's Meeting
on September 27, 2018. All business activity of the debtor three prior
years from the filing of this motion as well as older activity and
documents shall be examined.

SM

1011 W. GRACE ST RICHMOND, VA 23220
SAMUEL J.T. MOORE III PRO SE 9/30/18

B420A (Official Form 420A) (Notice of Motion or Objection) (12/16)

EDVA (12/16)

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re: Michael Robert Dickinson)

[Set forth here all names including married, maiden, and
trade names used by debtor within last 8 years.])

Debtor)

Address 3717 PATTERSON Avenue)
RICHMOND, VIRGINIA 23221)

Last four digits of Social Security or Individual Tax-payer
Identification (ITIN) No(s), (if any): 4844)

Employer's Tax Identification (EIN) No(s), (if any):)

Case No. 18-34024-KRH

Chapter 13

NOTICE OF MOTION (OR OBJECTION)

SAMUEL J.T. MOORE III has filed papers with the court to SEEK A MOTION

PURSUANT TO RULE 2004 DIRECTING EXAMINATION OF DEBTOR AND PRODUCTION
of documents.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion (or objection), or if you want the court to consider your views on the motion (or objection), then on or before NOVEMBER 7, 2018, you or your attorney must:

- ☐ File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court

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You must also send a copy to:

☐ Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing**

☒ Attend the hearing on the motion (or objection) scheduled to be held on NOVEMBER 7, 2018 at 12:00 NOON at United States Bankruptcy Court, FOR THE EASTERN DISTRICT OF VIRGINIA, RICHMOND DIVISION, 701 E. BROAD ST., RICHMOND, VA 23219 COURTROOM 5000

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: 9/30/18

Signature, name, address and telephone number of person giving notice:

SM
SAMUEL J. T. MOORE III
1011 W. GRACE ST.
RICHMOND, VA 23220 (757) 324-7794
Virginia State Bar No. PRO-SE
Counsel for _____

Certificate of Service

I hereby certify that I have this 1 day of October, 20 18, mailed or hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to the parties listed on the attached service list.

SM

SERVICE List for motion filed

Concerning Case No. 18-34024-KRH by
creditor Samuel J.T. Moore III

- 1) Michael Robert Dickinson (debtor)
3717 Patterson Ave., Richmond, VA 23221
- 2) Sharon Choi Stuart (debtor's attorney)
Stuart Law Firm, LLC,
2222 Monument Avenue
Richmond, VA, 23220

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

In re:

MICHAEL ROBERT DICKINSON
Debtor(s)

Case No.

Chapter

18-34024-KRH
13

Plaintiff(s)

Adversary Proceeding No.

v.

Defendant(s)

CERTIFICATION UNDER LOCAL BANKRUPTCY RULE 2090-1

Document Title: MOTION FOR RULE 2004 EXAMINATION
Date Document Filed:
Docket Entry No.

I declare under penalty of perjury that (Check one box):

☒ No attorney has prepared or assisted in the preparation of this document.

☐ The following attorney prepared or assisted in the preparation of this document.

(Name of Attorney)

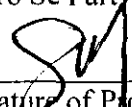
(Address of Attorney)

(Telephone Number of Attorney)

SAMUEL J.T. MOORE #

Name of Pro Se Party (Print or Type)

Name of Pro Se Party (Print or Type)



Signature of Pro Se Party

Signature of Pro Se Party

Executed on: 9/30/2018 (Date)